

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0000

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS LION TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T24-95-97)

The United States Postal Service hereby provides responses of witness Lion to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T24-95-97, filed on September 30, 1997.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 14, 1997

OCA/USPS-95. Please refer to witness Lion's response to OCA/USPS-T24-79d, and the table below.

CAG	Nondelivery Facilities	Boxes Installed	Boxes In Use	General Delivery Customers	Customers Subject to the Quarter Mile Rule
[1]	[2]	[3]	[4]	[5]	[6]
A	3				
B	1				
C	6				
D	2				
E	18				
F	59				
G	197				
H	412				
J	874				
K	2622				
L	714				
NA	37				

Please complete the table.

RESPONSE:

The data to complete the columns on Boxes Installed and Boxes In Use are in the file BOXES.DATA in USPS LR-H-216. See responses to OCA/USPS-T24-4 and OCA/USPS-T24-20. There are no available data by CAG on general delivery or on customers subject to the quarter-mile rule.

OCA/USPS-96. Please refer to witness Lion's responses to OCA/USPS-T24-79d, and OCA/USPS-T24-73c.

- a. Please confirm that classified offices and contract stations can be "nondelivery facilities." If you do not confirm, please explain.
- b. In OCA/USPS-T24-79d, please provide, in total and for each CAG, the number of "nondelivery facilities" that are
 - i. contract stations, and
 - ii. classified offices.
- c. In OCA/USPS-T24-73c, for the column "Sept. 1997 Contract Stations," please provide, in total and for each CAG, the number of contract stations that are
 - i. "nondelivery facilities," and
 - ii. delivery facilities.

RESPONSE:

- a. Confirmed.
- b-c. See the tables on the following pages. In these tables "contract facilities" include contract stations, contract branches, and community post offices, sometimes collectively referred to as "contract postal units" or "CPUs".

	Nondelivery Facilities		
CAG	Contract	Classified	Total
A		3	3
B		1	1
C		6	6
D		2	2
E	3	18	21
F	15	59	74
G	11	198	209
H	14	403	417
J	19	866	885
K	24	2,575	2,599
L	1	649	650
NA	1	3	4
Total	88	4,783	4,871

Source: ALMS and DSF, September, 1997.

	Contract Facilities			
CAG	Delivery	Nondelivery	Unknown	Total
A	623		9	632
B	439			439
C	930			930
D	394			394
E	556	3		559
F	305	15		320
G	267	11		278
H	196	14		210
J	157	19		176
K	160	24		184
L	10	1		11
NA	7	1	1	9
Total	4,044	88	10	4,142

Source: ALMS and DSF, September, 1997.

OCA/USPS-97. Please refer to witness Lion's response to OCA/USPS-T24-79d.

- a. Please define the term "facility" as used in the response. Please explain.
- b. Is there a one-to-one relationship between facility and post office or finance number? Please explain.
- c. Is there a one-to-one relationship between facility and 5-digit ZIP Code?
- d. Can a facility be associated with more than one finance number? If so, please explain.
- e. Can a finance number be associated with more than one facility. If so, please explain.
- f. Can a 5-digit ZIP Code be associated with more than one facility? If so, please explain.
- g. Can a facility be associated with more than one 5-digit ZIP Code? If so, please explain.

RESPONSE:

- a. A postal "facility" is a separate building or space in a building owned or paid for the Postal Service that is used to provide postal services or *perform postal functions*.
- b. The term "post office" is equivalent to finance number. A post office may have multiple facilities.
- c. No.
- d. Yes. There are facilities, such as area offices, which have more than one finance number.
- e. Yes. See the Domestic Mail Manual § D910.5.1.
- f. Yes. For example a subordinate nondelivery facility can share a 5-digit ZIP Code with its parent post office.
- g. Yes. See the responses to parts b-f.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

K N Hollies

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